

THURSDAY, 27 APRIL 2017

**REPORT OF THE LEADER OF THE COUNCIL, PORTFOLIO HOLDER FOR
REGENERATION****TAMWORTH FUTURE DEVELOPMENT AND INFRASTRUCTURE****EXEMPT INFORMATION**

None

PURPOSE

To inform Cabinet of the options available to them for formally raising their concerns regarding the negative implications of proposed and promoted developments on and around the Borough boundaries. These options will relate to potential local collaboration with neighbouring authorities and, the potential to escalate and seek Central Government intervention if necessary.

RECOMMENDATIONS

1. That the Leader and Chief Executive write to Lichfield District Council and North Warwickshire Borough Council reiterating the concerns expressed previously and set out in this report about the lack of strategic planning currently taking place and the potential impacts this may have.
2. That the aforementioned Councils be invited to adopt a more collaborative approach and work with Tamworth Borough Council on planning for future development and infrastructure from a more strategic perspective.
3. That the Leader and Chief Executive write to the Secretary of State for Communities and Local Government setting out the concerns expressed in this report and together with the details of the Council's efforts to resolve the matter locally.
4. That the Secretary of State be asked for his assistance to work with us and provide advice and guidance on assessing the options at a strategic level for collaboration and better joint working when planning the future development needs and taking advantage of the options for further growth in support of our efforts to deliver managed economic and housing growth to meet local needs and our obligations as an active member of the GBSLEP.
5. That the Leader and Chief Executive write to the GBSLEP setting out the concerns expressed in this report and ask for their assistance in addressing the issues raised.

EXECUTIVE SUMMARY

Locally and nationally there is growing concern from elected members and local communities in relation to the impact of proposed development sites by neighbouring authorities and sites being promoted for development in and around the boundaries of certain local authorities.

At a local level, this is clearly the case as demonstrated by the proposed and promoted developments on the Council's boundaries from both neighbouring authorities – Lichfield District Council and North Warwickshire District Council.

Tamworth has an up to date Local Plan. It was adopted in February 2016 and plans for the development needs of the town until 2031. The plan has considered the impact of the full amount of Tamworth's development needs on infrastructure and has policies to mitigate this impact.

There is concern that the cumulative impact of Tamworth's planned growth together with development sites being planned for by Lichfield and North Warwickshire Councils, and potential speculative planning applications in all three areas will have a serious detrimental impact on the infrastructure of Tamworth if not planned for properly i.e. collaboratively at a strategic level. The current situation can be summarised as follows:

1. Lichfield District Council is currently preparing its allocations document for which a consultation is taking place on the latest draft. This allocates land for the development of housing on the northern edge of Tamworth and in Fazeley. Furthermore, it also states that 6.5ha of land for employment uses will go towards meeting Tamworth's needs in Fradley. Lichfield is aiming to submit this document to the Secretary of State in July 2017.
2. North Warwickshire is currently preparing its revised Local plan to incorporate site allocations. A consultation has recently taken place and Cabinet approved a response in March. It is proposing to allocate land adjacent to the Eastern boundary of Tamworth for 1,191 homes and a further 2,071 in and around Polesworth and Dordon. It also proposes to allocate 8.5 hectares south-west of the A5 at Junction 10 of the M42 adjoining Centurion Park for the needs of Tamworth primarily for B1, B2 and B8 uses. It is planning to submit its plan in November 2017 but is also continuing to explore options for delivery. Whilst NWBC have commissioned a strategic transport assessment through Warwickshire County Council this was not used to inform the latest draft of the plan and at the time of writing is not completed. It is uncertain if this will be made public when it is completed.
3. Whilst both LDC and NWBC have identified that between them they will meet Tamworth's unmet employment land needs and where this will be met, neither has confirmed how much of Tamworth's unmet housing needs are being met between them, how this is split or the location for this unmet need.

It is clear that the level of growth being planned for in and around Tamworth exceeds the development needs of Tamworth and is greater than the unmet needs arising from Tamworth. The Tamworth plan only considered the infrastructure requirements based on Tamworth's needs.

The three Councils have not undertaken any joint work to examine the impact on infrastructure of the cumulative planned and proposed development will have and what mitigation is needed which is cause for significant concern.

There is growing concern that there is increasing pressure for development beyond that currently being planned for by the 3 Councils and speculative planning applications are being prepared. Again, the concern is that this will lead to piecemeal development without any consideration of the cumulative impacts of development on infrastructure. It is likely that this pressure will increase as a result of other areas not being able to meet their development needs and this will exaggerate the impact.

Furthermore, it would appear that there is a lack of strategic planning across the area leading to piecemeal development as a result of administrative boundaries. There are instances where development in one authority is being planned adjacent to planned development in another but there is little or no consideration being given to how the development will function cohesively as one.

Finally, there is no mechanism in place across the three authorities to capture the financial benefits that development brings, through either New Homes Bonus, NNDR, Council Tax or developer contributions that could be used to deliver infrastructure and services to mitigate and serve this new development. This is viewed as a missed opportunity particularly as all three authorities are active, voting members of either the Greater Birmingham & Solihull Local Enterprise Partnership or the West Midlands Combined Authority and play an important role in the economic geography of the West Midlands conurbation. All of this gives rise to a concern that the Duty to Cooperate is not working between the three local authorities.

Tamworth Borough Council remains committed to delivering its development needs in the most sustainable way possible in order to ensure economic growth and improved quality of life for its residents. The Leader of the Council and Chief Executive have publically stated the Borough's commitment to sustainable, managed growth a fact evidenced by the allocation of human and financial resources. However, the administrative boundary and current working arrangements is a potential barrier to achieving this. Consequently, the Council has been proactive in assessing the scale and scope of the problem and in seeking local, collaborative mechanisms for resolving matters. It is the Council's view that there are several options for addressing the matter. These include a) preparing

joint plans or plans at a more strategic level; b) changes to the administrative boundary, or c) special planning models such as an Urban Development Area.

It is with these in mind that it is recommended that both LDC and NWBC are formally contacted in order to reiterate the stated concerns of Tamworth Borough Council and to seek commitment to a formal, collaborative approach to addressing the stated issues and concerns. That both authorities be invited to jointly undertake a further piece of work designed to consider the infrastructure impacts and necessary mitigations in respect of the proposed and promoted developments. They will be asked to agree to adopt a collaborative approach to planning for new development where the implications impact on more than one LPA. It is also proposed that they are invited to consider a revision to the MoU.

Finally, the scale and scope of the potential implications are such that the risks to the infrastructure supporting a thriving and growing town within the functioning economic geography of the GBSLEP and WMCA warrant bringing to the attention of the Secretary of State for Communities and Local Government. With this in mind it is recommended that the Leader and Chief Executive write to the Secretary of State to set out these concerns; keep him apprised of the situation and seek his advice, guidance and if necessary, involvement in supporting the Councils as they consider the options available at a strategic level for improved collaboration and joint working.

OPTIONS CONSIDERED

The Borough Council could take no action but this would have detrimental implications on future prosperity as outlined in the report. The potential options for improving the current position are also outlined in the report.

RESOURCE IMPLICATIONS

There are no direct resource implications arising as a consequence of this report.

LEGAL/RISK IMPLICATIONS BACKGROUND

The legal implications of the Duty to Cooperate are highlighted in the report.

SUSTAINABILITY IMPLICATIONS

The report identifies that a consequence of a lack of collaborative working could be less sustainable form of development.

BACKGROUND INFORMATION

Context

Tamworth is one of the smallest Local Authorities in terms of geographical size in England. However, as a Borough of 76,813 (2011 Census) it is an urban area of significant size, the largest town in Staffordshire after Stoke City. As such it exerts significant economic influence over a wider rural area including smaller settlements such Polesworth, Dordon and Fazeley in the administrative areas of Lichfield and North Warwickshire. Since its designation as an Expanded Town in the 1950's has grown substantially and has achieved a wide range of social, economic and transport facilities.

Town and Country Planning History – Development Plans

In terms of planning for future development needs, due to the increasing size of the town, the small administrative area, environmental constraints such as floodzone and policy constraints such as greenbelt, it has been recognised for some time, (for example the 1996-2011 Staffordshire and Stoke-on-Trent Structure Plan (adopted 2001) and the West Midlands Regional Spatial Strategy Phase 2 Revision (commenced 2005)), that Tamworth's future development needs would need to be addressed through a wider assessment of development potential involving neighbouring authorities, Lichfield and North Warwickshire.

The draft RSS Phase 2 Revision contained within policy an expectation that Tamworth, North Warwickshire and Lichfield Councils would jointly consider the most appropriate locations for development prior to producing their next Development Plan Document (Local Plan).

To this end the three Council in 2008 commissioned a joint piece of work to examine how the scale of housing development identified within the submitted RSS Phase Two Revision could be most effectively accommodated, with a particular focus on Tamworth and its environs considering the infrastructure requirements arising from housing and employment growth and how these may impact on the scale and timing of growth.

In 2010 the intention to abolish RSS was made by Government, and with it the requirement for our neighbouring authorities to have to plan for a certain level of housing growth for Tamworth. The Duty to Cooperate was introduced through Section 110 of the Localism Act which transposes the Duty to Co-operate into the Planning and Compulsory Purchase Act 2004 (as amended) and introduces section 33A, which sets out a duty to co-operate in relation to the planning of sustainable development "the Duty". The Duty applies to all local planning authorities, county councils and prescribed bodies and requires that they must co-operate with each other in maximising the effectiveness with which development plan documents are prepared. The Localism Act 2011 states that in particular the Duty requires that engagement should occur constructively, actively and on an on-going basis during the plan-making process and that regard must be had to the activities of other authorities.

Tamworth and Lichfield Councils, along with Cannock Chase Council commissioned work to understand the projected housing needs of the area in 2011. Following the completion of this work and other pieces of evidence relating to employment needs and land availability in July 2012 a Memorandum of Understanding (MoU) was signed between Tamworth, Lichfield and North Warwickshire Councils. This MoU confirmed that Tamworth was unable to meet all of its housing needs and that Lichfield and North Warwickshire Councils would provide 500 units each. It also stated that the 500 for Lichfield would be located north of Anker Valley. The rationale behind this decision was to maximise growth in this area to ensure the necessary infrastructure (the Anker Valley and Amington Link Roads) could be delivered. In respect of employment land at that time, based on evidence and discussions with officers at North Warwickshire and Lichfield it was then agreed that Tamworth could accommodate its identified employment land needs within the Borough boundary. Notwithstanding this, there was acknowledgment that employment areas in Lichfield and North Warwickshire, (principally at Fazeley and Birch Coppice) also contributed to providing jobs and stimulating economic activity within Tamworth.

In August 2012 Birmingham City Council notified Councils in the West Midlands area that initial work on their Core Strategy had identified a shortfall between their housing need and how much they could deliver.

The 3 Councils prepared their Local Plans on this basis. Tamworth submitted its Local Plan in November 2012 but following correspondence with the Planning Inspectorate and an Exploratory Meeting, the Council took the decision to withdraw the Local Plan in March 2013. This was due to the concerns raised by the Inspector about the deliverability of the Anker Valley site, the principle, timing and impact of the homes in Lichfield and North Warwickshire and the process that would have to be followed to make the plan sound would mean a delay that the Inspector felt was too long.

North Warwickshire had submitted its plan in January 2013 and Lichfield in March 2013.

Tamworth Council sought to address the Inspectors concerns and new evidence was prepared and existing work updated and refreshed. A key piece of work (the BWB report) commissioned by the Council, Lichfield Council and Staffordshire County Council was a study to assess and appraise a number of potential transport packages associated with the Anker Valley Sustainable Urban Extension (SUE) to the northwest of Tamworth. The SUE contains land within both Lichfield District Council and Tamworth Borough Council and at the time in the withdrawn plan and in Lichfield's submitted Plan was expected to deliver a combined residential development of some 2,150 to 2,400 dwellings, with associated local centre and primary school.

The hearing sessions for Lichfield's Plan took place during June and July 2013. In September 2013 the Inspector issued his initial findings. These findings concluded that the plan was unsound in that it had not made adequate provision for the objective assessment of housing need contained in the evidence base, but that this could be remedied by identifying a site or sites to accommodate the additional growth, along with extending the Plan period by a further year. Lichfield undertook to produce further work to address these concerns.

The BWB report was completed in September 2013. The conclusion of that report was that no more than 500 homes could be constructed without further impacting on the local highway network, particularly the Upper Gungate corridor. It stated that a further 200 units could be delivered with some demand management measures. This assumed completion of the Upper Gungate “pinch point” works.

This had the impact of severely reducing the amount of land available at Anker Valley and therefore impacted on Tamworth’s ability to meet its own housing needs. The shortfall was estimated to increase to around 2000 homes.

Tamworth Borough Council made representations to the North Warwickshire and Lichfield examinations which were ongoing to make them aware of this situation. In addition Tamworth made representations objecting to the identification of a broad location to the north of Tamworth in Lichfield for 1000 homes on the basis of the identified constraint on the Upper Gungate corridor.

The final report from the Inspector in relation to North Warwickshire was received in September 2014 and for Lichfield in January 2015. In response to the issue of unmet need arising from Tamworth and from Birmingham the Inspectors recommended Main Modifications as follows for North Warwickshire:

This Council has a proven track record in cooperating with neighbouring authorities in strategic planning matters. It commits to working collaboratively with other authorities, and in particular Birmingham and Tamworth, to objectively establish the scale and distribution of any emerging housing and employment shortfalls. In the event that work identifies a change in provision is needed in the Borough of North Warwickshire an early review of the North Warwickshire Local Plan will be brought forward to address this”. (MM4)

And for Lichfield:

That the Council will carry out an early review or partial review of the plan if further housing provision is needed to meet the needs of Birmingham or Tamworth. Alternatively, in the case of Tamworth, the need for further housing provision could be dealt with through the Lichfield District Local Plan: Allocations document (MM1)

Furthermore, in relation to the broad location identified to the North of Tamworth. The Inspector was convinced by Lichfield and the promoter of the site that further highway work “has far to go before it reaches its conclusion and that the Broad Development Location should be retained in the Plan as there is a reasonable prospect that some additional housing, over and above that which it has been resolved to permit [165 units in Lichfield at Browns Lane and 535 units in Tamworth at Anker Valley], will be able to be accommodated”. The Inspectors report also stated:

If it transpires that the Broad Development Location as a whole is not capable of delivering something in the order of 1,000 dwellings then MM1 provides the mechanism through which additional land could be identified either through a review of the Plan or through the preparation of the Lichfield District Local Plan: Allocations document.

Tamworth Borough Council continued work on its Local Plan evidence base. The draft Local Plan recognised the need for housing for the period 2006-2031 is 6,250. The Plan based the needs for other development land and infrastructure was based on this figure. The Plan was submitted in late 2014. A public examination took place in the summer of 2015, the Inspectors report was received and the Plan adopted in February 2016. The Plan sets out that there is a housing need of 6,250 homes and a minimum of 32ha of employment land. The Plan makes provision for a minimum of 4,425 homes and a minimum of 18ha of employment land. It also set out that a further 1,825 homes and a minimum of 14ha would need to be accommodated in Lichfield and North Warwickshire.

NWBC are currently producing a new local plan that combines the existing adopted Core Strategy with allocated sites. Policy LP39 sets out that 1,191 homes will be allocated adjacent to Tamworth Borough Council at land west of Robeys Lane and 2,071 homes in and around Polesworth and Dordon. Further sites area also allocated in Kingsbury, Shuttington, Warton and Wood End for a total of 181 homes. Policy LP40 sets out that 8.5ha of employment land will be allocated at Centurion Park to meet Tamworth needs. NWBC hope to submit the plan to the Secretary of State for examination in November 2017.

LDC are currently preparing their allocations to document to support their Core Strategy. Policy FZ1 proposes to allocate 209 homes in Fazeley. Policy NT1 proposes to allocate 1000 homes to the north

of Ashby Road at Arkall Farm and 165 homes north of Browns Lane. Policy EMP1 allocates 23.7ha of land for employment uses and states “the provision of 6.5 hectares of employment land to assist in meeting the employment land needs of Tamworth Borough which have not been met within the Borough boundary”. LDC hope to submit the plan to the Secretary of State in July 2017.

Town and Country Planning History – Planning Applications

In addition to work on the Development Plans in each Authority there have been planning applications submitted on individual sites. An application for up to 1000 homes at Arkall Farm in Lichfield District was submitted in May 2014 and has a resolution to grant in February 2017. An application for development for 165 homes at Browns Lane in Lichfield District was submitted in January 2014 and permission issued in February 2015. An application for 535 homes at Anker Valley in Tamworth was submitted in April 2014 and permission issued April 2015.

HMA

There remains a continued shortfall between planned sites for housing and housing needs across the Greater Birmingham and Black Country Housing Market Area. Work has been commissioned across the area to examine how this shortfall could be addressed. There remains concerns that this shortfall may increase further as the Black Country have identified problems in addressing needs arising from their areas.

Future Development

The application for 1,000 homes north of Ashby Road on Arkall Farm has brought to the fore concerns about delivering the infrastructure to meet future development needs. Furthermore, proposed allocations around Tamworth in the Lichfield Part 2 Local Plan and the new Local Plan for North Warwickshire have raised concerns about the impact on Tamworth and its infrastructure and the surrounding infrastructure. Whilst recognising that there are unmet development needs for Tamworth that Lichfield and North Warwickshire should be planning for (1,825 homes and a minimum of 14ha of employment land), there is concern that the current proposals and known developer interest was far in excess of the total number of homes and employment land needed for Tamworth and the infrastructure planned for to support that known development need.

The Plan in Appendix A aims to show a selection of housing sites in and around Tamworth. The focus has aimed to look at those places where there is a strong relationship with Tamworth. It should be noted that some information has been gleaned on a ward basis. These are sites which have been constructed, have had planning permission granted, are allocated in development plans, are proposed to be allocated in forthcoming plans and where there is known developer interest through enquiries or submissions to Strategic Housing Land Availability Assessments.

In summary:

	<u>Tamworth</u>	<u>Lichfield</u>	<u>North Warks</u>	<u>Total</u>
Homes completed 2006-2016	1,516	124 (Fazeley) 1 (Hopwas) 6 (Wigginton) (all 2008-2016)	48 (Polesworth) 48 (Dordon) 27 (Kingsbury) 2 (Shuttington) 3 (Warton) 50 (Wood End) 1 (Freasley) (2006-2016)	1,826
	TOTAL 1,516	TOTAL 131	TOTAL 179	
Homes with Planning Permission as at 31 st March 2016	2,304	112 (Fazeley) 1 (Hopwas) 165 (Wigginton)	157 (Polesworth) 41 (Dordon) 30 (Kingsbury) 6 (Shuttington) 15 (Warton) 12 (Wood End) 88 (Overwood Road, Tamworth)	3,031

	TOTAL 2,304	TOTAL 378	(2006-2016) TOTAL 349	
Homes allocated in a development plan without consent	1317 (including: Dunstall Lane 800; Cottage Farm Road 54; Bus depot 40; Beauchamp employment area 34; Coton House Farm 77; Coton Hall Farm 35; Spinning School Lane 74; Former railway sidings 30) TOTAL 1317	No allocations in adopted plan	No allocations in adopted plan	1317
Homes proposed to be allocated in forthcoming plans	0	1000 (arkall farm) 165 (Browns Lane) 209 (Fazeley) TOTAL 1,374	1191 (Robeys Lane) 2071 (Polesworth & Dordon) 41 (Kingsbury) 24 (Shuttington) 88 (Warton) 28 (Wood End) TOTAL 3,443	4,817
Number of homes where there is known developer interest	500 (Land south-west of Dosthill) TOTAL 500	300 (north of Gillway) 85 (north of Browns Lane) TOTAL 385	48 (Overwoods road) 133 (south of Dosthill) 500 (Robeys Lane) 893 (land to west of M42 and north of b5000) 389 (land south of B5000 and West of M42) 1150 (land north of railway, Polesworth) TOTAL 3,113	3,998
Total	5,637	2,268	7,084	14,989

It is clear that there are sufficient sites that have been built, have planning consent or are proposed in draft plans to meet and exceed the housing needs of Tamworth. It must be recognised that some of these homes will meet the needs of places beyond Tamworth, such as those at Fazeley, Polesworth and Dordon. However, the key concern is that in preparing the plans for Tamworth consideration to the infrastructure needed to support development has only considered the needs identified in Tamworth, i.e. 6,250 homes. It should also be recognised that whilst some work has taken place on infrastructure to support individual proposals no further work has looked at infrastructure across the wider geography over the 3 authorities.

Furthermore, there have been no mechanisms put in place to capture contributions from developers or the benefits of New Homes Bonus towards providing infrastructure in Tamworth or infrastructure across a larger geography.

In addition to the residential sites with planning consent, those allocated or proposed to be allocated in development plans and sites being promoted, there are employment land sites adjacent to Tamworth. North Warwickshire is proposing to allocate 8.5ha of land at Centurion Park to meet Tamworth's

employment land needs. This site is currently under construction. Furthermore, a site to the west of the M42 and south of the A5 was recently granted planning permission for 25.4ha.

Duty to Cooperate

As described above, each Local Authority has a duty to co-operate in relation to the planning of sustainable development “the Duty”. Acknowledged by the Government in the recent Housing White Paper (see elsewhere on this agenda) that the Duty has not been successful. The White Paper sets out a number of actions to address this, including preparing statements of common ground, allowing spatial development strategies to allocate strategic sites, provision of funding to encourage collaboration and the Secretary of State directing Local Authorities to work together on a joint plan.

There have been a series of Memorandum of Understandings that have been signed by the three authorities that have sought to articulate an agreed framework for co-operation.

Whilst each Council has agreed to contribute 500 homes each, and have agreed to take a proportion of the unmet housing needs arising from the Greater Birmingham HMA, of which some of Tamworth’s unmet needs are part, there is no agreement on if the full 825 remaining homes is being met by LDC and NWBC, how that is split between them or the location for that development.

It is recognised that when it comes to employment needs, NWBC are currently proposing to allocate 8.5ha and LDC 6.5ha to meet Tamworth’s needs. There is no evidence to demonstrate that all of Tamworth’s unmet needs have been addressed (the Tamworth Plan identifies a **minimum** of 32ha of employment land) and there is no formal agreement or an updated MoU to confirm the position.

It seems that rather than dealing with Tamworth’s unmet needs in a strategic manner, they are being dealt with in an opportunistic manner. It is recognised that the consented and proposed development around Tamworth will be a contribution to meeting Tamworth’s unmet needs but there is a failure to recognise the impact on the infrastructure within Tamworth and this causes serious concerns.

There is also a concern about the piecemeal nature of the proposed developments because of administrative boundaries leading to poorer quality developments which will impact on communities that finally live there. For example, there are two sites in Tamworth which are allocated in the adopted plan and have planning permission granted where there is also a proposal in a neighbouring authority to allocate land to abut each of these developments. Each site will provide a primary school which could mean that in both instance there are two schools within a few hundred metres of each other. They have not been jointly masterplanned to ensure they act as comprehensive developments. So, rather than having two large planned urban extensions there will be four. This leads to a poorer quality development, missed opportunities and missed efficiencies.

Options / White Paper

The Government has acknowledged in its recent Housing White Paper (considered elsewhere on this agenda) that the Duty to Cooperate has not been successful in every area. Whilst relationships with neighbouring authorities are positive and officers meet to discuss progress of their plans and highlight any issues, the three authorities have not worked together jointly on a piece of work for some years. Given the issues described above and the likelihood of the need for future planning across the sub region, this approach cannot be considered to be satisfactory.

There are alternatives to the current approach of three separately produced plans for the three Councils. The three authorities could produce a joint plan to cover strategic issues across the total geography of the three authorities or a strategic plan to cover an area covering Tamworth and its hinterland. This could be based on existing governance structures or a more formal Joint Committee. A similar approach could be the creation of a Joint Planning Unit which could see the resources and powers of the three authorities pooled into a combined team. This could include plan making and decision making powers. Another variant of this model could be an Urban Development Company. It could focus on the urban area of Tamworth and its hinterland and seek to explore future opportunities for growth and the infrastructure required to enable it. This could explore how Tamworth could continue to play its role in the wider economic geography of the West Midlands conurbation, exploit the opportunities that growth in this area will present, for example that associated with HS2. A further approach would be to seek a change to administrative boundaries. None of these approaches is without issues of governance, cost and change. These could be explored further with our neighbouring authorities and the advice of the Government could be sought to further understand the implications of these.

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LIST OF BACKGROUND PAPERS

Tamworth Borough Council Duty to Cooperate Statement October 2014 :

http://www.tamworth.gov.uk/sites/default/files/planning_docs/A_local-plan/A14%20Duty%20To%20Co-op%20Submission%20Statement.pdf

APPENDICES

A) Plan of sites with planning permission, allocated in development plans, proposed in draft development plans and known interest

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